

SEAL
United States District Court
 NORTHERN DISTRICT OF TEXAS

FILED
 JAN 19 2018

CLERK, U.S. DISTRICT COURT

COMPLAINT By _____

Deputy

Mc

UNITED STATES OF AMERICA

V.

KENDALL JACKSON

CASE NUMBER: 3:18-MJ-039-BH

I, the undersigned complainant, being duly sworn, state the following is true and correct to the best of my knowledge and belief: On or about January 18, 2018, in the Dallas Division of the Northern District of Texas, **Kendall Jackson**, the defendant, did

knowingly and intentionally take, by force and violence, and by means of intimidation, from the person and presence of another, namely, an employee of BBVA Compass Bank, 2209 West Northwest Highway, Dallas, Texas, United States currency belonging to and in the care, custody, control, management and possession of BBVA Compass Bank, a bank, the deposits of which were then insured by the Federal Deposit Insurance Corporation,

in violation of 18 U.S.C. § 2113(a).

I further state that I am a(n) Task Force Officer (TFO) with the Federal Bureau of Investigation (FBI) and that this complaint is based on the following facts:

See attached Affidavit of FBI TFO Frank J. Carcone, which is incorporated and made a part hereof by reference.

Continued on the attached sheet and made a part hereof: ☒ Yes ☐ No

Frank J. Carcone

FRANK J. CARCONE
 Task Force Officer, FBI
 Dallas, Texas

Sworn to before me and subscribed in my presence, on this 19th day of January, 2018, at Dallas, Texas.

IRMA CARRILLO RAMIREZ
UNITED STATES MAGISTRATE JUDGE
 Name & Title of Judicial Officer

Irma Carrillo Ramirez
 Signature of Judicial Officer

AFFIDAVIT

I, Frank J. Carcone, a Detective with the Dallas Police Department (“DPD”) and currently assigned as a Task Force Officer (“TFO”) with the Federal Bureau of Investigation (“FBI”), being duly sworn, depose and state as follows:

INTRODUCTION

1. I have been employed as an officer with DPD since 1998, assigned as a Detective to the CAPERS/Robbery Unit since 2007, and I am currently assigned to investigate violations of 18 U.S.C. § 2113, relating to bank robbery.

2. The information contained in this affidavit is from my personal knowledge and from information provided by other individuals, further, it does not represent all information collected in this investigation; rather, it only includes the facts necessary to establish probable cause for the arrest of **KENDELL JACKSON** (Jackson) for bank robbery in violation of 18 U.S.C. § 2113(a).

INVESTIGATION

3. On January 18, 2018, DPD officers responded to a robbery in progress at the BBVA Compass Bank located at 2209 West Northwest Highway, Dallas, Texas, a location within the Northern District of Texas, whose deposits are insured by the Federal Deposit Insurance Corporation. TFOs William Ellstrom, Frank Carcone and Anthony Winn responded to the offense location. TFO Ellstrom interviewed the victim-teller and assistant branch manager.

4. The victim-teller stated that he was working at the BBVA referenced above on January 18, 2018. At approximately 3:43 p.m., a black male, later identified as

Kendell Jackson, entered the bank, approached, and pointed a handgun at him and stated, "*You know what to do.*" Jackson was wearing a grey hoodie, sunglasses, and carrying a grey backpack. The victim-teller, in fear for his life, removed \$5,570 in United States currency from the drawer and placed it on the counter. Jackson began stuffing the money, which included a dye-pack and bait bills, into his pocket. He then left the location on foot.

5. The assistant manager who was working at the BBVA during the robbery observed a Black male enter the location, approach the victim-teller, pull the handgun from his right-side waste band, point it at the victim-teller, take the money, and leave the location. The manager pressed the silent alarm and locked the doors after Jackson departed. While locking the door, the manager observed Jackson running across the street and the dye-pack activating, which caused a cloud of smoke.

6. DPD Officers Carlos De La Fuente #10403 and Daniel Jamieson # 9370 responded to the robbery in progress at the BBVA Compass Bank. They observed Jackson in the parking lot of the Jack-in-the-Box across the street from the BBVA Compass Bank. He was carrying a grey backpack. When Jackson observed the officers, he immediately turned and walked in the opposite direction. Jackson was detained, and the officers immediately noticed red dye on the palm of his hand.

7. Upon searching Jackson, officers located a Glock 22, .40 caliber pistol bearing serial number XZM420. Inside the grey backpack, officers seized \$4,327. They seized an additional \$1,274 from Jackson's pant pocket. The total amount

recovered was \$5601. Officers recovered the bait bills in the money and noted that some of the money was stained with red dye.

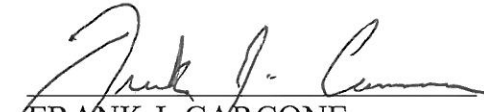
8. DPD Sgt. John Nash # 6389 was notified by an employee of Jack-in-the-Box about a strange smell coming from the bathroom area. Sgt. Nash went to the men's restroom and found a grey hoodie, which was covered in red dye, in the trash can. TFO Carcone contacted the Manager of Jack-in-the-Box and gained access to the surveillance video system. The video shows Jackson entering the restroom wearing the grey hoodie right after the bank robbery and exiting the restroom without the hoodie right before he was taken into custody.

9. Jackson was transported to DPD headquarters and interviewed by TFOs Carcone and Winn. TFO Winn advised Jackson of his *Miranda* warnings, which he knowingly and voluntarily waived, and he agreed to speak with them. Jackson subsequently confessed to committing the instant bank robbery. In addition, Jackson confessed to an attempted bank robbery at a Capital One Bank on December 1, 2017 and a bank robbery at a BBVA Compass Bank on January 2, 2018.

CONCLUSION

10. Based upon the foregoing facts and information, there is probable cause to believe that Jackson committed the above-referenced BBVA Compass Bank robbery at 2209 West Northwest Highway, Dallas, Texas, a location within the Northern District of Texas, in violation of 18 U.S.C. § 2113(a).

Respectfully submitted,


FRANK J. CARCONE
Task Force Officer, FBI

Sworn to before me and subscribed in my presence on this 19th day of January,
2018.


IRMA CARRILLO RAMIREZ
United States Magistrate Judge